

Department of Water Resources

Division of Flood Management

Flood Corridor Program 2010-2011 Funding Cycle Workshops Q&A

Contents

Eligible Project Types	1
Bond Management System (BMS), Proposal Selection, and Solicitation Schedule	7
Local Match	9
Disadvantaged and Severely-Disadvantaged Communities	11
Resolution.....	12
Flood Benefits & Hydrologic and Hydraulic Studies.....	12
Easements.....	14
Funding Agreements and Miscellaneous.....	16

Eligible Project Types

Q: Can funds be used to remove at-risk structures from a floodplain, including mobile homes?

A: Yes, every project must reduce flood risk using primarily non-structural means (removing structures qualifies), and must have either a habitat or agricultural land conservation component with enough benefit to score well when evaluated competitively against other projects.

Q: Would daylighting creeks that are either concreted over or in a pipe be an eligible project type?

A: Yes, if daylighting the creeks is coupled with habitat conservation and improvement benefits and if the project also provides flood benefits. This may also work well if combined with an upstream detention basin project. For instance, the detention basin would provide flood control benefits and daylighting the stream would enable habitat restoration.

Q: Would funding a floodwater causeway under a bridge be fundable through our program?

A: The guidelines indicate that, with Department of Water Resources Director approval, a maximum 50 percent of Flood Corridor Program funds can be spent on structural elements. If the other funding sources for this project can fund a greater portion of the structural elements that are limited in fundability by the Flood Corridor Program such that only 50% of the grant from the Flood Corridor Program is used to fund structural elements, that could fit within the Flood Corridor Program. The project would also need to compete with other proposals.

Q: Regarding off stream basins, would channel improvements be eligible even if they are not natural corridors? What about irrigation canals and increasing the capacity of the canals?

A: Canals would be considered structural improvements and they can be part of proposed projects; however, structural work necessary or appropriate to achieve project objectives can generally only be funded up to 20% of the total Flood Corridor grant amount (note: where non-structural elements cannot function without structural elements, 30-50 percent of the Program funds may be allocated for structural elements. This will require approval from the Director of the Department). Daylighting canals can be an eligible part of the project and would be considered non-structural if the channel has earthen bottom and sides and supports natural habitat.

Q: Would expanding a ponding basin be eligible?

A: If it is natural bottom and supports habitat, it would qualify. Or in theory, the proposed project could have a large basin that could be used for agriculture and that would be eligible, too.

Q: Isn't building a levee structural?

A: The ultimate non-structural situation is no levee at all. The original legislation that created the Program defined setback levees as non-structural. The rationale for this is that if you have existing levees that are on the river bank and you move them away from the river, you're moving in the direction of a non-structural situation and creating more floodplain and allowing the river to meander naturally, creating a wider river channel.

Q: Can funds be used for work that would protect agricultural lands or habitat where a mitigation project/easement is already in place?

A: Mitigation can't be paid for with these Flood Corridor grant funds unless it is for impacts that result from projects funded by this program. If it is mitigation that is a requirement for another project, this grant can't be used to pay for it. However, if the proposed project includes additional habitat restoration that is near or at the mitigation site, then yes, funds may be applied from this program. Funds from the program can only be used for conserving land where an easement is already in place if the current easement is not permanent or needs to be made more restrictive to ensure adequate long-term protection for the land.

Q: This project provides very large flood protection benefits utilizing thousands of farm acres and has huge agricultural benefits. Long term sustainability throughout the Basin requires addressing groundwater overdraft and stabilizing groundwater supplies. Agriculture is unsustainable in this region without it. (This project includes transitory floodwater storage and groundwater recharge with potential for compensation to landowners, on land that is outside of the floodplain.) Is this project something DWR would consider appropriate for this funding opportunity? Is there something in this project that on first look is outside the scope or mission of the corridor work and should be supported by other funding sources? What is the best way to show this and talk about it?

A: The project may fit within the program scope and appears to have potential. It's not clear if this proposed project is in the floodplain or not. For the purposes of the Flood Corridor Program, a project may be in a 100-year floodplain if there are levees that protect the project area and the levees offer less than the 100-year level of protection. However, a project need not be in the floodplain so long as the project provides substantial benefits to the floodplain (see page 8, #2 of the Guidelines). The project would be evaluated competitively against other proposals. In order to be eligible for funding by this program, a proposal must score at least 50% of the possible points in each of the three categories: flood protection, wildlife and/or agricultural land conservation, and quality of proposal and additional benefits. Guidance for information to provide is found in the application, section "Agricultural Land Conservation Benefits" and that information will be used in scoring as indicated in Section 3 of the application.

Q: Can the Program give planning and design funds to help finalize the concept and design work for a project?

A: Yes, the Flood Corridor Program typically does not provide funding for planning unless it will lead to a project that provides a tangible benefit. The Program will fund planning and design if it is a small percentage of the total grant amount and if it leads to actual construction and that construction leads to a tangible flood benefit coupled with habitat or agricultural land conservation. If Program funds are to be provided for plans, permits, and design, the costs for these must be kept to a relatively small percentage of the grant like 10% or less of the total project budget, unless the additional funds for planning or design come from another source. The implementation phase and construction that provide tangible results would be where the bulk of the money gets used. If additional money is needed for design, the 10% local match could be used for this.

Q: Would a project that is only for easement acquisition be fundable, for instance to prevent floodplain development and the flood damage that would subsequently occur?

A: If the proposed project is within the 100-year floodplain (at least 50% in the floodplain per the guidelines), then yes, an easement-only project would fit with the Flood Corridor Program. It would have to meet all the criteria for flood-risk reduction and habitat or agriculture protection.

Q: Maintenance endowment: Is it possible to apply for funds for a maintenance endowment when property has already been purchased, flood risk reduction has already occurred, some habitat restoration is already done, but some has not?

A: In theory, habitat creation can be applied for separately from prior funding of flood control improvements, but historically such applications have not scored well unless there is a compelling State interest in creating the habitat. Funding for the maintenance endowment can be up to 20% of the cost of the property purchased or 20% of the cost of improvements when improvements are paid for using grant funds. Because habitat enhancement is considered an improvement, if the cost for the habitat that needs to be created is substantial, the Flood Corridor Program can pay up to 20% of that amount for a maintenance endowment if the project scores high enough to be selected for funding.

Q: Mitigation for another project: can an applicant acquire property using Flood Corridor grant funds and later use it as mitigation for another project?

A: That could be allowed by the Flood Corridor Program but only if the mitigation is paid for from another source.

Q: The guidelines state that sometimes projects can be funded for more than \$5 million. In what circumstances would this occur?

A: It would have to be a project of regional importance that is extraordinarily high in benefit to a sizable area.

Q: If a proposal was submitted for more than the \$5 million cap, would it be penalized (i.e. as compared to less costly projects)?

A: The proposal would not be penalized but the applicant should explain why the project is of regional importance and identify in the Project Description how the project could be divided into phases, and by what percentage the project's budget could be reduced before the project becomes infeasible.

Q: Are there any restrictions on where the funds can be used? Can a project be implemented on federal, private, State property?

A: Yes as long as the grantee has the right to do the project. The Flood Corridor Program has funded projects on federal, State, and private property. If the proposed project is on private property, the grantee has to have the landowner's authorization and a legally enforceable commitment to preserve it in perpetuity, typically a conservation easement.

Q: Does the Program fund vegetation eradication projects?

A: The Flood Corridor Program doesn't fund one-time invasive plant control projects where the invasive plants are likely to return. The Program has funded projects that, as a component of the project, remove invasive plants if the plants are replaced with native habitat and there is provision for ongoing maintenance to keep the invasive plants from returning.

Q: Will the program fund a project which is upstream of a dam/flood control facility?

A: It is possible. The applicant would need to document how the upstream attenuation has a downstream flood benefit.

Q: Under what conditions can a project's budget include more than the 20% structural maximum?

A: In rare cases the limit on structural elements may be exceeded with strong justification:

- Where 20 to 30 percent of the Program funds are allocated to structural elements, Flood Corridor Program staff concurrence is required; or
- Where non-structural elements cannot function without structural elements, 30-50 percent of the Program funds may be allocated. This will require approval from the Director of the Department.

Q: Is it a problem that the Kings River is not included in the State's Flood Control Plan? The Kings River is intentionally left out. However, Kings River flood flows need to be accommodated in the San Joaquin River. So there is acknowledgement of flood management issues associated with the Kings River on the part of Kings River managers including the Army Corps.

A: This would not disqualify an application. Flood Corridor grants may be applied anywhere in the state to reduce the risk of damaging floods. Because the selection process is competitive, the proposed project will be compared with other proposals in terms of the flood-reduction benefits and other benefits.

Q: This project does not do wildlife enhancements within the channel. The primary wildlife enhancement is shallow water habitat during spring through creation of extensive acreage of flooded fields. Is this type of wildlife enhancement sufficient for the flood corridor program?

A: It is not necessary to include both agricultural and habitat benefits for this grant program; either one or both may be involved, but there is no increased benefit by having both. It may be useful to determine which aspect is strongest and just indicate that one as the criterion to include so that averaging with a weaker habitat benefit does not diminish the score from a stronger agricultural benefit, if that's the case. If the habitat benefit can be enhanced (e.g., migratory waterfowl benefits with foraging, nesting, and shelter habitat rather than just open water alone), the habitat benefit may be strengthened). This is just an example and not necessarily a recommendation. How well a project scores for habitat conservation and enhancement depends on the value of the habitat at that location and its importance to the wildlife species that use it.

Bond Management System (BMS), Proposal Selection, and Solicitation Schedule

Q: Has the money already been bonded, is it already there?

A: It is assumed that there will be future bond sales so that there is money in the bank to cover existing and future projects. The Governor wants to defer bond sales from spring to the fall of this year. If they defer the bond sales further, that is beyond our control and our knowledge.

Q: What is the schedule for the funding cycle and how long should projects be?

A: The money has to be appropriated by 2016. It is recognized that that good projects take time. Normally Flood Corridor Program contracts are for three years, but if needed, they can be extended to five years or longer. The goal would be to complete the project as quickly as can reasonably be accomplished.

Q: Can you print your application on the website?

A: The BMS allows an applicant to print out their application. The applicant will need to print out their uploaded documents separately.

Q: Can you work on BMS and come back to it another day to work on it some more?

A: Yes, an applicant can start their application immediately and work on it anytime. Make sure to hit the save button before moving on to another tab within BMS or the unsaved work will disappear.

Q: What's the schedule for awarding funds? When do the funds expire?

A: We should know by June 2011 which proposals were successful. Proposition 1E funds need to be appropriated by 2016. Projects can theoretically be ongoing past this date.

Q: If a project is not chosen, would the applicant be contacted?

A: Yes, letters will be sent to those applicants whose projects were successful as well as not successful during this round of funding. Also, the selection results will be posted on the Flood Protection Corridor Program website for two weeks before becoming final.

Q: The application states that the SOQ should be limited to two pages. Can it be less than that?

A: Two pages is the maximum. In the past there have been occasions when too many pages were submitted per person. Anything less than two pages per person is acceptable as long as it adequately describes the person's skills and experience related to their role in implementing the project.

Q: I'm wondering about the proposal review process. It's important for me to know who is reviewing this information because it requires me to make decisions on the level of detail I provide for topics such as fluvial geomorphology and channel evolution processes.

A: There will be reviewers with engineering, ecology, agricultural and economic expertise in order to evaluate proposals on the scoring criteria. They will also represent the different geographic regions of the state. The review process also includes a site visit prior to assigning a score to the proposal.

Local Match

Q: Regarding the non-State, non-federal 10% match, can funds that were used as a match on another, federal, grant proposal be used during the term of a grant agreement from this program, or could they have been spent in the project already? Is in-kind matching permitted?

A: Yes, the Program will allow matches if used for the same project from non-State and non-federal sources within the past two years. The Program will allow matches used for:

- an awarded non-state grant,
- the *portion* of a match for another awarded state grant that is over and above the dollar amount required for that awarded state grant, and/or
- the increased value of a match (i.e., if a match of property increased in value from the earlier-proposed match with the awarded state grant, the increased value could be used as a match for a Flood Corridor grant).

Q: If property is already owned by the applicant can that be used as the in kind match?

A: Yes, property can be used as a match. It should be noted that if State grant funds are used to improve the property, a conservation easement or other enforceable restriction on the title will need to be applied to ensure the property is conserved in perpetuity for the use for which grant funds were provided.

Q: Is there a look-back period for the match?

A: The Flood Corridor Program allows for two years prior investment that can be counted for match, but it has to be related specifically to the project and has to come from non-State and non-federal sources.

Q: Funding we've been awarded is at risk of being lost unless we can begin certain activities. If we can begin these activities now, prior to a possible award from the Flood Corridor Program, can these activities qualify for funding as part of this project?

A: Yes, funds from other sources used up to 2 years prior to the award may be used as a match to with a Flood Corridor grant, but if funds are from State or federal sources they cannot be counted as part of the required 10% non-State non-federal match.

Q: Can local agency funds be considered a match?

A: Yes, local agency funds can be considered a match.

Q: There is significant non-cash support being provided as grant match for this proposed project. Several experts are volunteering time or providing significantly reduced rates. Can we use the base rate for these experts in our match calculation?

A: Yes, as long as the rates are reasonable. It would have to be a real commercial rate that they would charge. Project accounting would need to document the rate being used, the time spent on the project, and what was accomplished with that time.

Q: We have several opportunities to use County fee-sourced co-funding in this grant, one of these is to complete a Base Flood Elevation determination for part of the planning area, which we would complete as part of our project analysis. Would this be an allowable task under the terms of this grant since those data are already required for our project?

A: If base flood elevation studies are being paid for by a non-federal and non-State source, it would qualify as a match. The Flood Corridor Program would fund this if there is not another funding source available, so long as the work occurs after the project is under contract with the Flood Corridor Program.

Disadvantaged and Severely-Disadvantaged Communities

Q: How do you define the benefit area of the project for the purposes of determining if it is a disadvantaged community or not?

A: If the area benefited has flood-risk reduction; that would count. Any area affected by the project that has the flood risk reduced is the area benefited. A fixed geographic area that has a certain level of flood risk pre-project and a reduced level of flood risk post project. That area benefiting from the project would need to be evaluated in terms of the disadvantaged community criteria.

Q: Are the Census 2000 and current Department of Finance (DOF) estimates the only definitive sources of disadvantaged status? A hybrid of information to bring 2000 Census data current would not be useable?

A: DOF and Census data are primary sources. If a community does their own study and can show that their study is more accurate, then that's okay but it has to be something defensible and reliable. If it looks reasonable the Program will accept it.

Resolution

Q: Resolution: does it need to be executed or can you send a draft?

A: A draft will be accepted but the resolution should be executed within 30 days of the proposal due date and no later than 60 days after the due date.

Q: The sample resolution (2nd bullet) specifically states "that applicant understands the assurances and certifications in the application." These don't appear in the grant guidelines.

A: The assurances are that the applicant understands that the program requires a number of items. These items are included in the Flood Corridor Program Guidelines as eligibility and completeness criteria between pages 8 and 15, and there are other Program requirements described at various locations in the Guidelines. The assurances refer to all the required actions that a grantee must take if grant funds are awarded.

Q: What are the specific assurances and certification identified in the required resolution?

A: In addition to assuring that all grant requirements will be fulfilled, the resolution needs to state that the governing board has authorized a certain person to submit an application on their behalf.

Flood Benefits & Hydrologic and Hydraulic Studies

Q: I'm wondering if you know a good source of info or contact person that can provide property value damage from floods between Redding and the Delta?

A: This type of information is typically kept at the local (e.g., county) level. For instance, the county or regional emergency management and/or flood control department may have that data. Also, property values would be kept locally. Newspaper archives may also be a valuable source for historic flood information.

Q: How does an applicant show a flood benefit potential prior to a completed H&H analysis, which the grant would pay for?

A: Contact an engineer who is a hydrologist or registered Civil Engineer who understands flooding and flood benefits. That person would give their opinion (e.g., an Engineer's Letter) as to what the benefit is likely to be. An H&H study is needed in most cases to substantiate the engineer's opinion as to flood benefits.

Q: Is there an example of the achieved flood benefits from other applications? What level of flood benefit needs to be achieved to have a viable application?

A: It depends on the competition. The value of the flood benefit should at least equal the cost of achieving it .

Q: What is the format for providing flood damage prevention information?

A: A hydrologic and hydraulic (H & H) analysis and cost-benefit analysis is usually needed. Both flood-risk reduction from probability standpoint (chance of flood occurring in any given year) and an analysis of the cost of the flood portion of the project in relation to the monetary value of flood damages reduction (flood damage under pre-project conditions compared with flood damage under post-project conditions) should be provided.

Q: How should we talk about reduced liability to taxpayers and costs to repair structures? This project provides very large flood protection benefits utilizing thousands of farm acres. It includes transitory floodwater storage and groundwater recharge on land that is outside of the floodplain. How do we talk about value here? There is value to farmland, disadvantaged communities, levee protection, and high-value homes. How do we best quantify?

A: A project need not be in the floodplain to qualify for funding under the Flood Corridor Program but the application needs to indicate how the project would provide substantial flood risk reduction benefits to the 100-year floodplain as described in the Guidelines (page 8, #2). Also, see Guidelines, page 13, #16. The application needs to quantify the flood-risk reduction benefit to the areas that would benefit from the proposed project. Presumably these include downstream farms, levees, or developed areas. Levees are included because protecting them also has the effect of avoiding large levee repair

costs, aside from protecting the structures and features behind the levees. The USACE has an approach to determine flood benefit/cost ratios. For instance, if the application can indicate how much the proposed project would reduce the volume of surface water flowing into and damaging floodplain areas and thus reduce the frequency of a certain flood event (e.g., reducing the frequency of a 100-year discharge/flood event to a 200-year event) and then annualize the associated cost of damages from that event to homes, structures, crops, etc. downstream (e.g., divide the cost by 100 years and 200 years and determine the difference, that would indicate the approximate annualized benefit from the proposed project. The estimated time the proposed project would last multiplied by the annualized savings benefit would equal the estimated total cost savings from the proposed project. That could then be compared to the cost of the proposed project to determine the relative value of the project. [Note: Please only use this as an example. There are other ways that an applicant may analyze and discuss flood-risk/damage reduction. A consultant or university expert may be able to prepare these estimates, and a more involved hydraulic and hydrologic analysis may ultimately be needed and funded by the Flood Corridor grant.]

Q: What should an applicant do if they are only acquiring property rights/easements and preserving agricultural land and will not be changing the hydrology of the area? Do they still need to hire an engineer to write a letter?

A: In this case, there is no need for an H&H study. All that is needed is an explanation of this approach in response to the H&H question in BMS.

Easements

Q: Is it an acceptable project to apply to obtain an easement or do you actually need to have the easement negotiated as an option already?

A: The application needs to indicate a willing seller for the easement. Also, a willing easement holder should be identified.

Q: For easement acquisitions, are they based on an appraisal? Is there a requirement for multiple appraisals?

A: They are based on an appraisal approved by the State. The appraisal has to be recent, completed within a year, unless property values are changing rapidly, in which case the appraisal should be more recent.

Q: Regarding conservation easement language in general, is there any specific language you're looking for that has to do with flooding regiments and that kind of thing?

A: The Flood Corridor Program has a model that is a starting point, but we've found that each project is unique and easement language is tailored to the specific needs and requirements for each project. It has to preserve the habitat value and/or agricultural value and provide whatever flood benefit/preservation that's needed for that situation.

Q: Can you elaborate on why easements are preferred over fee title?

A: It has to do with the tax base. Where a fee title acquisition would remove property taxes from a local entity/county, the Flood Corridor Program would generally not fund it unless the local entity approves of it. If fee title acquisition would not remove property from the local property assessor's roles, there is no preference for an easement. However, the fee title holder would have to convey an easement to a third party to ensure the conservation and flood values are preserved in perpetuity.

Q: Would obtaining flood easements on project benefit the project or make more attractive? Are there benefits to farmers from flood easements such as compensation?

A: A perpetual agreement is required to ensure that the flood-risk reduction and the agricultural conservation (or habitat conservation/restoration or both) actions will continue to be there in the long-term future. Yes, flood and other easements typically include compensation to the landowner in return for the requirement that the land be used for the purpose(s) stated in the easement. In some cases a landowner can gain a tax benefit by donating an easement or fee title to an eligible non-profit recipient.

Q: Regarding a perpetual conservation easement, is there a standard document that can be referenced?

A: The Flood Corridor Program has a model easement and that will be posted on the website.

Funding Agreements and Miscellaneous

Q: If an applicant is successful in receiving funds from the Program and needs to contract out for a study (H&H, CEQA document, etc.) would there need to be three bids and must the lowest bidder be chosen even if they are not as qualified as another bidder?

A: If the grantee is already under contract or has someone on staff who can prepare the study, no competitive bidding is required. Otherwise, three bids would be required. A grantee should follow its standard competitive procurement procedures for securing a contractor.

Q: If interim financing is needed after an agreement is signed, is interest an eligible expense?

A: If it is the State's fault that funding wasn't available, then yes, interest is an eligible expense. These situations will be evaluated on a case by case basis.

Q: This project includes transitory floodwater storage and groundwater recharge with potential for compensation to landowners, on land that is outside of the floodplain. The compensation agreement can be conducted in perpetuity. The motivation for in perpetuity action by landowners is utilizing flood flows to recharge a highly over-drafted and threatened groundwater basin through either direct or in lieu recharge. Is this sufficient for this program? Addressing groundwater issues throughout the Kings Basin is critical for a sustainable farming industry in the area, even for high value crops which are being grown. The amount of flood flows, on average, are roughly equivalent to the overdraft occurring in the Basin.

A: This is complex. This project may or may not fall into the category of a "public-private" partnership depending on what is being proposed. If both a public (State) and

private entity put up funding to make the project happen, the value of the benefit that comes out must be the same ratio as the funding to avoid a "gift of public funds". So, if there is a compensation benefit and the State was involved in the infrastructure, etc., to enable that project, the State must be compensated at the same rate as their proportionate funding (i.e., inputs and outputs must be the same ratio). Also, there has to be a perpetual agreement to use the land as proposed for the flood-risk reduction and agricultural or habitat benefit. However, the perpetual agreement doesn't have to be an easement or fee title acquisition as long as it is recorded in the County Recorder's Office, does not expire, and is legally enforceable by a third party. If the recharge agreement provides for perpetual protection of the required land uses and benefits, that should be sufficient. However, if the land may be unprotected and at risk of development or another land use, purchase of an easement by the State could enable protection of the land such that it can be assured of staying in its use for recharge and flood-risk reduction. If that is the case, and State funds were used for an easement and not infrastructure for the project in which a private entity is getting compensated, it may not be considered a public-private partnership, and the land would be protected by the easement instead of the recharge agreement.

Q: Can you elaborate on the plan to minimize impacts to the adjacent landowners? What topics/considerations are you looking to have addressed?

The Plan to Minimize Impacts to Adjacent Landowners is defined in Proposition 13 and needs to include the following:

- An evaluation of the projects impacts on floodwaters;
- The structural integrity of affected levees;
- Existing and proposed diversion facilities;
- Current and historic agricultural practices on the project site and in the vicinity;
- Timber extraction operations; and
- An evaluation with regard to maintenance.

Q: Could the application be submitted without an appraisal?

A: Yes it could but, if the appraisal shows a different market value than budgeted, the total project cost typically is not changed. Therefore, either money would need to be pulled from other line items to make up the difference or left on the table. In other words, once the amount of the grant has been determined, it is not likely to be changed. Sometimes, if there is money left over, it can be redirected to other project activities to

increase the project benefits. But the decision to do this is discretionary with the State and would be based on the benefits to be gained. The benefits from the change would have to be better than the benefits that could be obtained by redirecting the surplus funds to another project.

Q: Will you be posting further details like the agreement boilerplate that would identify requirements like state appraisal reviews and restrictions on use and management of the trust fund established with these funds?

A: The agreement boilerplate language will be posted on the Flood Corridor Program website. State appraisal review is a requirement. Appraisals have to be representative of fair market value and completed in the recent past so they are current. Trust funds are specifically for maintenance. They must be invested at interest in a relatively safe investment and the interest must be used only for maintaining the property.

Q: Quarterly reports and annual reports, what is involved in this?

A: After the project starts and the agreement is signed, quarterly or monthly reports are usually submitted with invoices. The reports include what was accomplished and any issues that arose in the reporting time period, whether the project is on schedule, changes to the schedule, and a comparison of expenditures with the schedule and status of project completion. The annual reports are maintenance reports that begin after the project is completed.

Q: Can we submit an application without an appraisal?

A: Yes, the appraisal would need to be completed before the land was acquired from the landowner. In order to apply, the application would need to indicate a best guess on what the estimated value would be and that would need to be included in the budget. If the appraisal shows the property is worth more when it comes time to purchase, money would need to be transferred from one part of the budget to make up for it, or if the property is shown to be worth less, there could be money left on the table. With written approval, these funds could be moved to some other worthwhile effort that is needed to complete the project or moved to another high value project. This decision is discretionary with the State.